

Application No. 09/867,343
Amendment "D" dated March 10, 2006
Reply to Office Action mailed January 12, 2006

REMARKS

The Final Office Action of January 12, 2006, considered and rejected claims 27-55. Claims 27-55 were each rejected as unpatentable and obvious under 35 U.S.C. § 103(a). In particular, claims 27-34, 37-41, 43-49, 51-53 and 55 were rejected as being unpatentable over the "Universal Plug and Play Device Architecture" document (the "UPnP architecture"), which is cited in the Applicants' IDS of 5/23/2003, and also over Kekic et al. (U.S. Patent No. 6,272,537). Claims 35-36, 42, 50, and 54 were rejected as being unpatentable over the UPnP architecture and Kekic, in light of the Microsoft Word 2000 application.¹

By this paper, claims 27 and 43 have been amended, and no claims have been added or cancelled.² Accordingly, following this paper, claims 27-55 remain pending for examination, of which claims 27 and 43 are the only independent claims at issue.

The present invention is directed to embodiments for discovering, controlling and displaying Universal Plug and Play (UPnP) devices on a system. For example, as recited in claim 27, a generic user control tool includes a user interface that displays, in a first window panel, a plurality of user-selectable device search fields usable for selecting among alternatives defined by the user interface. Moreover, the plurality of selectable search fields includes a plurality of selectable search type options that correspond to different types of searches for discovering UPnP devices on a system. In addition, in response to user selection of any of the selectable search type options, the generic user control point tool collects UPnP device information and it is displayed as a list of selectable UPnP devices at the first window panel of the user interface.

Independent claim 43 is directed to a method for discovering, controlling, and displaying UPnP devices on a system using a generic user control point tool user interface generally corresponding to the elements of claim 27. In particular, the method includes displaying a user

¹ Although the prior art status and some of the assertions made with regard to the cited art is not being challenged at this time, Applicants reserve the right to challenge the prior art status and assertions made with regard to the cited art, as well as any official notice, which was taken in the Office Action, at any appropriate time in the future, should the need arise, such as, for example in a subsequent amendment or during prosecution of a related application. Accordingly, Applicants' decision not to respond to any particular assertions or rejections in this paper should not be construed as Applicant acquiescing to said assertions or rejections, or to the prior art status of any cited art.

² Support for the claim amendments are clearly supported by Figures 2 and 3, and by the disclosure found on pages 14 and 15 of the originally filed specification. Accordingly, it is respectfully submitted that the amendments to the claims do not add new matter, and entry thereof is respectfully submitted.

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interface with a generic control point tool in a first window panel. Further, the method includes displaying at the user interface a plurality of user-selectable device search fields usable for selecting among alternatives defined by the user. The plurality of user-selectable device search fields also include a plurality of search type options that correspond to different types of searches for discovering UPnP devices on a system. As further recited, in response to user selection of any of the selectable search type options, the method claimed method includes collecting UPnP device information corresponding to compliant UPnP devices on the system and displaying the compliant UPnP devices in a selectable list at the first window panel.

Applicants respectfully submit that the claimed invention is neither taught nor suggested by the art of record. For example, the "client graphical user interface", the MIB browser, and auto-discovery panel as taught in Kekic, fail to teach or suggest a user interface that displays a plurality of user-selectable search fields in a first window panel, wherein the plurality of selectable fields are each usable for selecting among alternatives defined by the user interface and, in response to user selection of any of a plurality of selectable search type options, displaying UPnP device information as a list of selectable UPnP devices at the first window panel, as claimed in combination with the other recited elements. In contrast, while auto-discovery panel 2700 (see Figure 27 of Kekic) appears to illustrate a total of three fields (i.e., an IP Address field 2702, a Limited Search field 2703, and a Read Community field 2705), only the selectable Limited Search field 2703 appears to have defined selections of Yes and No, while IP Address field 2702 and Read Community 2705 appear to include text boxes where the user enters input such that it is defined by the user. (See Col. 43, ln. 36 to Col. 44, ln. 57). Stated another way, Kekic appears to teach that only a single field (i.e. Limited Search field 2703) includes any defined alternatives, and fails to teach that each of a plurality of user-selectable device search fields are usable for selecting among alternatives defined by the user interface, as claimed in combination with the other recited elements.

Also in Kekic, MIB browser 3600, as shown in Figure 36, is similarly limited, and includes only a single, selectable search box 3603 for selecting among multiple defined alternatives, while a user must enter the remaining information into various fields. (Col. 51, ln. 43 to Col. 52, ln. 11.) Further, the available selection is among MIB files, rather than devices or search types, as claimed. Accordingly, whereas the claims recite a plurality of selectable device search fields, each of which are usable for selecting among alternatives defined by the user

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interface, and a plurality of selectable search type options corresponding to different search types for discovering UPnP devices, MIB browser 3600 appears to limit defined searches to files.

In addition, the MIB browser and the auto-discovery panel do not appear to be a first window panel as recited in combination with the other elements of the claimed invention. In particular, auto-discovery panel 2700 is optionally generated in panel 603 of client graphical user interface 600A or 600B, and is used to discover SNMP-enabled computer network elements and populate them in navigation tree 305. (Col. 43, ln. 36 to Col. 45, ln. 17.) Upon discovering all such elements, Kekic teaches that the discovered SNMP-enabled computer network elements are displayed in navigation tree 305, situated within a separate area 604 of graphical user interface 600A or 600B. (Col. 45, ll. 5-7; Figs. 6A, 6B). Further, the MIB browser is executed as "another graphical user interface." (Col. 22, ll. 41-52). Accordingly, neither the graphical user interface (including the auto-discovery panel) nor the MIB browser acts as a user interface that displays, in a first window panel, both a plurality of selectable device search fields and a list of selectable UPnP devices, as claimed in combination with the other recited elements.

The other cited art also fails to teach or suggest such a generic user control point tool having a user interface as recited in the claims. In fact, with regard to the other cited art, the Examiner has acknowledged: "[a]dditionally, the UPnP architecture document does not explicitly describe user interface features for discovering and controlling such devices." (Office Action, page 6). Accordingly, and for at least these reasons, UPnP architecture and Kekic do not, either alone or in combination, teach or suggest a user interface that displays, in a first window panel, a plurality of user-selectable device search fields each of which are usable for selecting among alternatives defined by the user interface, and in which a list of selectable UPnP devices is displayed at the first window panel of the user interface as claimed, and particularly in combination with the other recited elements.

Although the foregoing arguments are specifically related to claims 27 and 43, it will be appreciated that, for at least the foregoing reasons, all of the other rejections and assertions of record with respect to the dependent claims are now moot, particularly when considering the combination with elements recited in the corresponding independent claims.³ Therefore, the dependent claims need not be addressed individually.

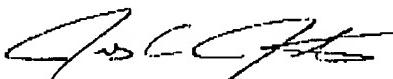
³ Nevertheless, and as previously noted, Applicants note that they do not acquiesce to the assertions made of record by the Examiner. For example, among other assertions, Applicants disagree with the Examiner's characterization

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For at least the foregoing reasons, Applicants respectfully submit that the pending claims 27-55 are neither anticipated by nor made obvious in view of the cited art of record. In the event that the Examiner finds remaining impediment to a prompt allowance of this application that may be clarified through a telephone interview, the Examiner is requested to contact the undersigned attorney.

Dated this 10 day of March, 2006.

Respectfully submitted,



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that "a list of variables" meets the limitation of a "selectable list of actions" which can be invoked and from which a selected action is selected, as recited in claim 40.